

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARCO ANTONIO SANCHEZ, individually and  
on behalf of all other similarly situated persons,

Index: 16-cv-4472

Plaintiffs,

JYP FOODS INC., d/b/a KRISTALBELLI, and JOON  
KIM,

Defendants,

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**NOTICE OF MOTION TO STRIKE ANSWER AND DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that upon the Complaint and the annexed supporting Declaration of Gennadiy Naydenskiy, Esq. as well as the exhibits attached thereto, and the Memorandum of Law in Support of Plaintiffs' Motion for Default Judgment Pursuant to Federal Rules of Civil Procedure 55(b)(2), Plaintiffs respectfully request that the Court enter an Order:

1. Striking Defendant JYP FOODS INC., d/b/a KRISTALBELLI, and JOON KIM's answer and Granting default judgment against Defendant JYP FOODS INC., d/b/a KRISTALBELLI, and JOON KIM, in the liquidated amount of \$144,539.10, which includes compensatory damages, NYLL liquidated damages, statutory damages for lack of notice, attorneys' fees, and court costs and disbursements.

2. Granting such other, further or different relief as the Court deems just and proper.

Plaintiff herewith submits a Proposed Order, attached hereto as an Exhibit, for the Court's convenience.

Dated: December 28, 2017

Respectfully submitted,

NAYDENSKIY LAW GROUP, P.C.

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s/  
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